

George Henry Newman
Board Certified Criminal Trial Advocate
George H. Newman & Associates PC
100 South Broad Street, Suite 2126
Philadelphia, PA 19110

*Please
Docket*

(215) 592-9400
Fax (215) 574-0698

GHNLawyer@yahoo.com

April 14, 2016

(via telecopier)

The Honorable Paul S. Diamond

Re: U.S.A. v. Rae Talley
Docket No. 0313 2:14CR00285-001

Dear Judge Diamond:

Ms. Talley's sentencing is scheduled for April 19, 2016 at 11:00 a.m. She informed me this morning that her maternal grandfather died in Harrisburg, where she resides. The funeral has not yet been scheduled although I would anticipate that it would be this weekend or early next week. Because of her personal family tragedy, I respectfully request that this matter be postponed for a modest period of time. The assigned Assistant United States Attorney, Mary Kay Costello, has kindly informed me that the Government has no objection to such a continuance.

I understand that it may be possible to reschedule the sentencing until April 29th. I would be most grateful if Your Honor would therefore postpone the sentencing to a date suitable to the Court, both counsel, and Ms. Talley.

Thanking Your Honor in advance for your kind consideration, I am,

Respectfully,


George Henry Newman

GHN/new

Mary Kay Costello, Esquire, marykay.costello@usdoj.gov (via e-mail)
Judy Hunt, U.S. Probation Officer, Judy_Hunt@paep.uscourts.gov (via e-mail)